

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SYDNEY WATSON,**

**Plaintiff,**

**vs.**

**BLAZE MEDIA LLC,**

**Defendants.**

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**Civil Action No. 3:23-cv-00279-B**

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**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

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Plaintiff Sydney Watson (“Plaintiff”) and Defendant Blaze Media LLC (“Defendant”) (collectively, the “Parties”) move the Court for entry of the attached Agreed Protective Order to control the disclosure, production, and use of documents and information in this action. In support of this Joint Motion for Entry of Protective Order, the Parties respectfully show the Court as follows:

1. On May 3, 2024, the Court ordered the parties to confer about the need for a protective order and to submit an appropriate proposed order to the Court to address privacy concerns implicated in responding to Plaintiff’s Interrogatories Nos. 4, 8, and 9. *See* Dkt. 31. The Court also ordered that Defendant provide responses to Plaintiff’s Interrogatories Nos. 4, 8, and 9, no later than May 17, 2024. *Id.*

2. Counsel for Defendant and counsel for Plaintiff met in good faith to confer on the language of the Proposed Protective Order; however, the parties could not reach an agreement before the deadline in the Court’s May 3rd Order, and Defendant filed an Opposed Motion for Entry of Protective Order on May 17, 2024. *See* Dkt. 32.

3. On May 22, 2024, the Court denied Defendant's Opposed Motion for Entry of a Protective Order without prejudice to revise the proposed Protective Order in accordance with the Court's Order. *See* Dkt. 33.

4. Defendant revised the proposed Protective Order to reflect the Court's May 22nd Order, conferred with Plaintiff, and filed a Second Opposed Motion for Entry of Protective Order (the "Second Motion"). *See* Dkt. 34.

5. On May 31, 2022, the Court referred Defendant's Second Motion to United States Magistrate Judge Rebecca Rutherford for hearing, if necessary, and recommendation or determination. *See* Dkt. 35.

6. On June 3, 2024, Judge Rutherford set Defendant's Second Motion for hearing on June 13, 2024, and ordered the Parties to make a final attempt to resolve the dispute without court intervention prior to the hearing. *See* Dkt. 36. On June 10, 2024, the Court reset the hearing for July 1, 2024. *See* Dkt. 38.

7. Counsel for Plaintiff and counsel for Defendant conferred and have agreed to the entry of the proposed Agreed Protective Order, attached to this motion as Exhibit A, to control the disclosure, production, and use of documents and information in this action, as this action involves the revelation of confidential, proprietary, private, and/or otherwise sensitive documents and information, and believe entry of the Order is necessary to protect against improper designation thereof.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion for Entry of Protective Order enter the attached Agreed Protective Order.

Dated: June 27, 2024

Respectfully submitted,

/s/ Kurt A. Schlichter (with permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2024, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the following individuals who have consented in writing to accept this Notice as service of this document by electronic means:

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*/s/ Celeste R. Yeager*

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Celeste R. Yeager